

EXHIBIT E

Megan Benett

From: Steven R. Pounian
Sent: Friday, May 14, 2021 12:52 PM
To: 'Netburn_nysdchambers@nysd.uscourts.gov'
Cc: Kellogg, Michael K.; Rapawy, Gregory G.; Shen, Andrew C.; 'Huppert, Matthew R.'; 'rkry@mololamken.com'; 'Nitz, Eric'; Kabat, Alan; zSarah S. Normand; Vargas, Jeannette; Jim Kreindler; Steven R. Pounian; Andrew J. Maloney; Megan Benett; zJodi W. Flowers; zRobert Haefele; zMichael E. Elsner; SCarter1@cozen.com; zScott Tarbutton; 'Goldman, Jerry S.'; John Fawcett; Lisa Ranieri; Debra Pagan; 'Cashon, Richard'
Subject: Notices of Deposition for Bayoumi - June 9, 10 & 11; Jarrah - June 17 & 18; Fahad al Thumairy - June 28, 29 & 30
Attachments: Notice of Deposition - Omar al Bayoumi.pdf; Notice of Deposition - Musaed al Jarrah.pdf; Notice of Deposition - Fahad al Thumairy.pdf

Dear Judge Netburn and Counsel,

Attached are the notices of deposition of Omar al Bayoumi (June 9, 10 & 11, 2021), Musaed al Jarrah (June 17 & 18, 2021), and Fahad al Thumairy (June 28, 29 & 30, 2021).

Respectfully,

Steven R. Pounian
Of Counsel



Kreindler & Kreindler LLP

485 Lexington Ave
New York, NY 10017

T: 212.973.3477
F: 212.972.9432

E-mail: spounian@kreindler.com
Web: www.kreindler.com

Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

Please consider the environment before printing this e-mail.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**
-----X

**Civil Action No.
03 MDL 1570 (GBD) (SN)**

This document relates to: *All Cases*

NOTICE OF ORAL DEPOSITION OF MUSAED AL JARRAH

To: Defendant Kingdom of Saudi Arabia, through their attorney of record, Michael K. Kellogg, Kellogg Hansen Todd Figel & Frederick, PLLC, Sumner Square, 1615 M Street, N.W., Suite 400, Washington, D.C. 20036.

PLEASE TAKE NOTICE that, pursuant to Rule 30(b) of the Federal Rules of Civil Procedure, and in compliance with the orders for conducting depositions as issued by the Court in the above-captioned matter, the Plaintiffs' Executive Committees, on behalf of the Plaintiffs in the above-captioned multidistrict litigation, will take the audio and video recorded deposition upon oral examination of MUSAED AL JARRAH via videoconference, on June 17 and 18, 2021, starting each day on a time to be agreed by the parties and continuing from day-to-day on adjourned dates until completed with such adjournments as to time and place as may be necessary.

1. The deposition shall be taken with the assistance of a notary public or other person authorized by law to administer oaths, with the witness situated at a location to be determined and agreed to by the parties.
2. The parties shall meet and confer regarding the persons, if any, that may be allowed into the room with the witness during his testimony, and if no agreement can be reached, the issue may be presented to the Court for determination in advance of the deposition.
3. The deposition will be recorded by stenographic, sound, and video means. The parties shall meet and confer regarding the technical requirements for the equipment used to record the video and audio portions of the deposition, as well as the available bandwidth, and if no agreement can be reached the issue may be presented to the Court for determination.
4. The witness will be shown documents during the deposition by remote means requiring a stand-alone computer and monitor, which must be made available for the witness. The parties shall meet and confer regarding the technical requirements for that computer and monitor, and if no agreement can be reached the issue may be presented to the Court for determination.
5. Plaintiffs request that the Kingdom of Saudi Arabia and the witness produce, at least seven days before the deposition, a copy of the witness's current curriculum vitae or résumé and all documents used to refresh the witness's

recollection and/or upon which the witness will rely for his testimony.

6. Plaintiffs also request that the Kingdom of Saudi Arabia and the witness inform the Plaintiffs immediately, but in no event less than seven days prior to before the deposition, if the witness will testify in the English or Arabic language.
7. Please be advised that given the uncertainties and possible issues that may arise after we begin the depositions, Plaintiffs anticipate that the parties may need to meet and confer concerning protocols during breaks in the deposition to ensure the integrity of the deposition process and compliance with the discovery rules and standards.

Dated: May 14, 2021

COZEN O'CONNOR

/s/ Sean P. Carter, Esq.
Sean P. Carter, Esquire
Cozen O'Connor
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2105
E-mail: scarter1@cozen.com

*On behalf of the MDL 1570 Plaintiffs'
Exec. Committees*

KREINDLER & KREINDLER LLP

/s/ Steven R. Pounian, Esq.
Steven R. Pounian, Esquire
Kreindler & Kreindler LLP
485 Lexington Avenue, 28th Floor
New York, NY 10017
Tel: (212) 687-8181
E-mail: spounian@kreindler.com

*On behalf of the MDL 1570 Plaintiffs'
Exec. Committees*

MOTLEY RICE LLC

/s/ Robert T. Haefele, Esq.
Robert T. Haefele, Esquire
Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464
Tel: (843) 216-9184
E-mail: rhaefele@motleyrice.com

*On behalf of the MDL 1570 Plaintiffs'
Exec. Committees*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May 2021, I caused a copy of the foregoing Notice of Oral Deposition of MUSAED AL JARRAH to be served by electronic mail upon the Court and also upon the following for further distribution to counsel for all parties in this action:

Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Rm 430
40 Foley Square
New York, NY 10007
Netburn_nysdchambers@nysd.uscourts.gov

Michael K. Kellogg, Esq.
Gregory G. Rapawy, Esq.
Andrew C. Shen, Esq.
KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, PLLC
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
Tel: (202) 326-7900
mkellogg@kellogghansen.com
grapawy@kellogghansen.com
ashen@kellogghansen.com

Robert Kry, Esq.
Eric Nitz, Esq.
MOLOLAMKEN
600 New Hampshire Ave., N.W.
Washington, D.C. 20037
Tel: (202) 556-2000
rkry@mololamken.com
enitz@mololamken.com

Alan Kabat, Esq.
BERNABEI & KABAT, PLLC
1400 16th Street, N.W., Suite 500
Washington, D.C. 20036
Tel: (202) 745-1942
kabat@bernabeipllc.com

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 278-1000
jgoldman@andersonkill.com

Jodi Westbrook Flowers, Esq.
Robert T. Haeefe, Esq.
Michael E. Elsner, Esq.
MOTLEY RICE, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel: (843) 216-9000
jflowers@motleyrice.com
rhaefe@motleyrice.com
melsner@motleyrice.com

Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2000
scarter1@cozen.com
starbutton@cozen.com

James P. Kreindler, Esq.
Steven R. Pounian, Esq.
Andrew J. Maloney, Esq.
Megan W. Bennett, Esq.
KREINDLER & KREINDLER, LLP
485 Lexington Avenue, 28th Fl.
Tel: (212) 687-8181
jkreindler@kreindler.com
spounian@kreindler.com
amaloney@kreindler.com
mbernett@kreindler.com

Sarah S. Normand, Esq.
Jeannette A. Vargas, Esq.
U.S. DEPARTMENT OF JUSTICE
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, NY 10007
Tel: (212) 637-2709
sarah.normand@usdoj.gov
jeannette.vargas@usdoj.gov

/s/ Steven R. Pounian
Steven R. Pounian, Esq.